

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

R-1-1

The comment consists of an introduction and summary of the proposed project and does not contain any substantive statements or questions about DEIR 2005 and, no further response is necessary. Responses to questions posed in the letter are included as Responses to Comments 4-2 through 4-7.

R-1-2

This comment asks for documentation on how the fugitive dust emission rate for construction grading operations was determined. The South Coast Air Quality Management District (SCAQMD) CEQA Handbook estimates that each acre of graded surface creates about 26.4 pounds (lbs.) of particulate matter less than 10 microns in diameter (PM₁₀) per workday during the construction phase of the project and 21.8 lbs. of PM₁₀ per hour from dirt/debris pushing per dozer was used. The proposed graded area of the site covers a wide area. However, the entire site is not expected to be under construction at the same time. It is assumed that four acres of land would be under construction or exposed on any one day. It is also assumed that one dozer would be used 10 hours a day, together with other equipment. Therefore, a total of 323.6 lbs. of PM₁₀ per day would be generated from soil disturbance without mitigation during the grading phase. For the report, this was rounded up to 330 lbs of PM₁₀ per day.

R-1-3

The comment notes that the document states, "There are currently no federal project-level requirements for air toxics analysis and CEQA only requires a consideration of the risks from toxics but provides no guidance or quantitative analysis method," and points out that the SCAQMD has provided a guidance document since March 2003.

The corrected sentence will read in the, "There are currently no federal project-level requirements for air toxics analysis and CEQA only requires a consideration of the risks from toxics, with SCAQMD providing the *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*, March 2003 for guidance."

Please note that updated air quality/air toxics information was included in the Recirculated Draft EIR which was made available for public review on June 2, 2006. Please refer to the Recirculated Draft EIR for additional information.

R-1-4

This comment states that the air toxics discussion is incomplete because no data was provided nor was any analysis or impacts discussed. The City respectfully disagrees with the central points of the comment and would direct SCAQMD to the discussion of diesel exhaust emissions in the second paragraph on page 4.2-25 of DEIR 2005 which describes the data used to determine the total diesel exhaust emission rate. It refers to Table 4.2.K which lists total project-related operational emissions of all criteria pollutants, including PM₁₀. The traffic study concluded that the proposed project would generate 5,783 daily trips on weekdays and 8,503 trips on weekends. The analysis contained in section was augmented by analysis of diesel exhaust emissions for the total daily truck trips and

compared to another project with more total truck trips which did not have a significant impact as a result of diesel exhaust emissions.

Please note that updated air quality/air toxics information was included in the Recirculated Draft EIR which was made available for public review on June 2, 2006. Please refer to the Recirculated Draft EIR for additional information.

R-1-5

This comment asserts that DEIR 2005 does not provide any information or analysis on the number of trucks that would be servicing the facility at build out and contributing to air toxics impacts. The number of trucks used per day was built into the models and analysis techniques used in the project traffic study and this air quality analysis. For each land use type in this project (Home Improvement Superstore, Regional Shopping Center and High-Turnover Sit-Down Restaurant), assumptions for the vehicle-type percentages are documented in the Institute of Traffic Engineers, *Trip Generation*, 7th Edition (2003) and displayed in the URBEMIS2002 model displays. Combining this with the vehicle distributions documented in the City of Fontana *Truck Trip Generation Study*, August 2003 results in the values used in DEIR 2005.

Please note that updated air quality/air toxics analysis was included in the Recirculated Draft EIR which was made available for public review on June 2, 2006. Please refer to the Recirculated Draft EIR for additional information.

R-1-6

This comment is a recommendation to include additional mitigation measures to further reduce project operational emissions. The following will not be added to the FEIR as mitigation measures because they are either unenforceable by the City of Long Beach or are already required by other regulations or building code requirements:

- (u) Require trucks to be off-loaded promptly to prevent trucks idling for longer than five minutes.
- (u) Require trucks to be properly tuned and maintained.
- (r) Route trucks to avoid residential areas or schools (consistent with City requirements, trucks would only use designated truck routes).
- (u) Use light-colored roofing materials in construction to deflect heat away from buildings.
- (r) Install automatic lighting on/off controls and energy-efficient lighting.
- (r) Landscape with appropriate drought-tolerant species to reduce water consumption.
- (u) All company-owned trucks should use alternative clean fuel such as compressed natural gas, or where diesel trucks have to be used, trucks should use particulate filters, oxidation catalysts, aqueous diesel fuel and/or low sulfur diesel, as defined in SCAQMD Rule 431.2, i.e., diesel with less than 15 ppm sulfur content.
- (u) All equipment to provide power and air conditioning to the trucks to eliminate the need to run the engine or auxiliary power units.

(u) Use newer, lower-emitting trucks.

1) Unenforceable = u

2) Already required by other regulations of building code requirement = r

R-1-7

This comment correctly notes that the traffic data used in the Carbon Monoxide (CO) Hotspots analysis does not match the traffic data in the TIA. Please note that the air quality analysis contained in DEIR 2005 was updated and made available for public review on June 2, 2006. The findings of the updated analysis are consistent with the analysis contained in DEIR 2005 and no new significant impacts are expected to result from project implementation.

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

R-2-1

The comment provides information regarding processing of the document by the Southern California Association of Government (SCAG). The City acknowledges that SCAG has determined that the Proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines. The comment does not contain any substantive statements or questions about the Draft EIR, and no further response is necessary.

METROPOLITAN TRANSPORTATION AUTHORITY

R-3-1

The comment is introductory and does not contain any substantive statements or questions about DEIR 2005 and, no further response is necessary.

R-3-2

This comment acknowledges that the requirements of the Congestion Management Program for traffic analysis have been met and introduces several additional comments. The comment also states that all transit routes should be analyzed and not just the ones in the 2002 Transit Monitoring Network. DEIR 2005 discusses the existing Orange County Transportation Authority (OCTA) transit service, which includes bus stops (Routes 1 and 60). Long Beach Transit (LBT) does not currently provide service adjacent to the project site. Congestion Management Program (CMP) values were utilized to predict transit trips; it was anticipated that the existing transit services could accommodate the project-generated transit trips. LBT indicated that it does not anticipate providing new bus routes for the project but that new routes could be added in the future.

R-3-3

The comment states that DEIR 2005 does not discuss alternative transportation programs as they relate to the project because they would not change as a result of the project. Refer to Response to Comment R-3-2 regarding bus routes. The existing bus stops locations would remain.

R-3-4

The comments states that DEIR 2005 did not address bus turnouts as requested by OCTA in their NOP response letter. Refer to Response to Comment R-3-3 regarding transit demand. No bus turnouts would be provided as part of the project.

R-3-5

This comment concludes the comment letter and does not contain any substantive statements or questions about DEIR 2005. No further response is necessary.